

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

JOSEPH PASTORE

Plaintiff,

 γ_{p}

C.A. No. 04-12374 REK

REISS INDUSTRIES, LTD. dba HYDRO
COMPONENTS & SYSTEMS, LLC, and
LAMINATIONS, INC.

Defendants.

**AFFIDAVIT OF THOMAS J. REISS, JR. IN SUPPORT OF DEFENDANTS' MOTION
TO DISMISS PURSUANT TO RULE 12(b)(2)**

I, Thomas J. Reiss, Jr., hereby depose and state as follows:

1. My name is Thomas J. Reiss. I am the CEO of Reiss International, Ltd., the holding company for Hydro Component Systems, LLC (collectively "Hydro"), and I am the President of Hydro Component Systems, LLC.

2. The lawsuit names "Reiss Industries, Ltd" as a party presumably because the lawsuit asserts Reiss Industries is doing business as Hydro Component Systems.¹ If that is Mr. Pastore's assertion, the assertion is incorrect. Reiss Industries, Ltd. does exist, but Reiss International, Ltd. is the holding company for Hydro Component Systems, LLC.

3. Hydro is a Wisconsin corporation. Our only place of business is located in Watertown, Wisconsin. Reiss International companies unrelated to this lawsuit do have business locations in other cities Wisconsin, but no business locations in Massachusetts.

¹ The lawsuit actually names "Hydro Components and Systems, LLC", the correct name is Hydro Component Systems, LLC.

4. I know of no sale Hydro has ever made in Massachusetts.

5. Hydro is not registered to do business in Massachusetts, does not maintain a registered agent in Massachusetts, and owns no property there.

6. Neither I, nor any agent of Hydro, was personally served with the Complaint in this lawsuit while physically present in Massachusetts.

7. Hydro maintains all of its files in Wisconsin, sends all of its business correspondence from Wisconsin, and receives all such correspondence in Wisconsin.

8. Hydro uses banks in Wisconsin for its banking needs, and issues salary checks from Wisconsin using a Wisconsin bank account.

9. Hydro has no subsidiaries, distributors, or sales agents either in or assigned to Massachusetts.

10. Hydro does not direct any advertising to Massachusetts.

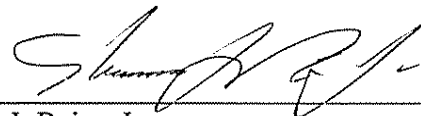
11. Hydro is not in the business of providing insurance.

12. Hydro does not have any directors or officers living in Massachusetts, and no Hydro director or officer is subject to a child support decree issued in Massachusetts.

13. Hydro Component Systems, does maintain a website at www.hydrocomponentsystems.com. This website allows individuals to request information from the company, but it does not permit on-line sales.

14 I understand that Mr. Pastore previously filed a lawsuit against HOH Systems, Inc. in Massachusetts. Hydro was neither a party to the lawsuit nor involved in any issue underlying that lawsuit. Hydro has no ownership interest or other affiliation with HOH Systems.

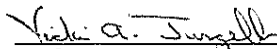
Signed under pains and penalties of perjury this 10 day of February, 2005.



Thomas J. Reiss, Jr.

Signed and sworn to before me on this ____ day of February, 2005 by Thomas J. Reiss.

[Seal]


(Vicki A. Jurgella)
Notary Public, State of Wisconsin
My commission 6/16/04 - 6/15/08

MW/1169024